

## REGION 1 TRANSLATOR ASSOCIATION

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Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

To Whom It May Concern:

RE: DA/FCC = 04-186, Unlicensed Transmitters on "Unused" TV Channels

We understand from various sources that the FCC is considering the adoption of rules to permit the operation of unlicensed devices on vacant TV channels. Anything that makes for better broadband data services in rural areas is desirable. However, not at the expense of free over-the-air television that the five northeast counties of Colorado have spent more than 25 years developing and maintaining at considerable cost. Simply put, there is no free over-the-air TV in this area without our system.

Our organization in cooperation with Washington and Logan Counties operate 78 TV translators on 11 sites with Construction Permits for 8 more which begin digital transmission this year. Locals who have observed digital television are eager to receive it especially as they observe the increased cost of pay TV reception.

We do not have the technical ability to suggest what rules the FCC on this matter might contain. However, we take the position that in our area there are NO UNUSED channels especially since channels 52 – 69 have been removed from the list of useable channels. The channels are interleaved here so that the output channels of one transmitting site are the input of another. They are spaced to cover the most area with the fewest transmitters. So the input at each transmitting site is at the absolute lowest level that will provide a good transmitted signal. Consequently, any extraneous interference is a problem. Indeed, skip interference is a major problem during sunspot, weather, and seasonal changes. We dread the idea that unlicensed transmitters would be allowed to further disrupt our current over-the-air television service. Our translator-input signals must be protected or service to entire communities will be wiped out!

Also, please remember many rural people use marginal signals that most city folk do not experience. Certainly, an unlicensed transmitter in such an area would likely interrupt or actually deprive those viewers of television service altogether. We understand that FCC "protected contours" does not define our full useful signal service area.

We urge the FCC to write the unlicensed rules in a very conservative manner. It will be easier to relax the rules later if they are overly restrictive than to correct problems later.

We ask you to protect the television service the northeast Colorado counties have worked so long and hard to provide for our communities.

Respectfully,

John F. Rietz  
FOR REGION 1 TRANSLATOR ASSOCIATION